ATTACHMENT 2
FIELD CHECKLIST

U.S. ENVIRONMENTAL PROTECTION AGENCY
SPCC FIELD INSPECTION AND PLAN REVIEW CHECKLIST

FOR USE AT ONSHORE FACILITIES (EXCLUDING PRODUCTION)

FACILITY INFORMATION			
FACILITY NAME: Lube-Tech			
LAT: N44° 57' 59"	LONG: W93° 11' 06"	Section/Township/Range:	
ADDRESS: 858 Transfer Rd.			
CITY: St. Paul	STATE: MN	ZIP: 55114	COUNTY: Ramsey
TELEPHONE: (763)417-1289	FACILITY REPRESENTATIVE NAME: Scott Bergman		
OWNER NAME:			
OWNER ADDRESS:			
CITY:	STATE:	ZIP:	
OWNER CONTACT PERSON:			
TELEPHONE:	FAX:	EMAIL:	
FACILITY OPERATOR NAME (IF DIFFERENT FROM OWNER – IF NOT, PRINT "SAME"): Same			
OPERATOR ADDRESS:			
CITY:	STATE:	ZIP:	
TELEPHONE:	OPERATOR CONTACT PERSON:		
FACILITY TYPE: Bulk oil storage, distribution		NAICS CODE:	
HOURS PER DAY FACILITY ATTENDED: > 8 hrs.	TOTAL FACILITY CAPACITY: ~ 1.2 million gal.		
TYPE(S) OF OIL STORED: Various kind of motor oil, lubricant, diesel			
LOCATED IN INDIAN COUNTRY? ☐ YES ☒ NO RESERVATION NAME:			

INSPECTION INFORMATION		
INSPECTION DATE: 4/29/09	TIME: 2:00 PM	INSPECTION NUMBER: 09-3-043
LEAD INSPECTOR: Shitien Yang		
OTHER INSPECTOR(S): —		

INSPECTOR ACKNOWLEDGMENT	
I performed an SPCC inspection at the facility specified above.	
INSPECTOR SIGNATURE: [signature]	DATE: 4/29/09

U.S. ENVIRONMENTAL PROTECTION AGENCY
SPCC FIELD INSPECTION AND PLAN REVIEW CHECKLIST

FOR USE AT ONSHORE FACILITIES (EXCLUDING PRODUCTION)

Overview of the Checklist

This checklist is designed to assist EPA inspectors in conducting a thorough and consistent inspection of a facility's compliance with the Spill Prevention, Control, and Countermeasure (SPCC) rule at 40 CFR part 112. It is a tool to help federal inspectors (or their contractors) record observations during the site visit and review of the SPCC Plan. While the checklist is comprehensive, the inspector should always refer to the SPCC rule in its entirety, the *SPCC Regional Inspector Guidance Document,* and other relevant guidance for evaluating compliance. This checklist must be completed in order for an inspection to count toward an agency measure (i.e., OEM/OECA inspection measures or GPRA).

The checklist is organized according to the SPCC rule. Each item in the checklist identifies the relevant section and paragraph in 40 CFR part 112 where that requirement is stated.

The compliance date for provisions from 2002 SPCC rule amendments that are more stringent than the 1974 rule has been extended until July 1, 2009 (See 72 FR 27443). More stringent provisions from the 2002 amendments are highlighted in *italicized and grayed text*. Where a 2002 amendment changes an entire provision, the 2002 requirements are shown in an *italicized and grayed* box with a heavy border. Where applicable, the alternative 1974 provision is shown in a gray box below the 2002 provision. These provisions are currently in effect for facilities that began operation on or before August 16, 2002.

Sections 112.1 through 112.6 specify the applicability of the rule and requirements for the preparation, implementation, and amendment of SPCC Plans. For these sections, the checklist includes data fields to be completed, as well as several questions with "yes" or "no" answers.

Sections 112.7 through 112.12 specify requirements for spill prevention, control, and countermeasures. For these sections, the inspector needs to evaluate whether the requirement is addressed adequately or inadequately in the SPCC Plan and whether it is implemented adequately in the field (either by field observation or record review). For the SPCC Plan and implementation in the field, if a requirement is addressed adequately, mark the "Yes" box in the appropriate column. If a requirement is not addressed adequately, mark the "No" box. If a requirement does not apply to the particular facility or the question asked is not appropriate for the facility, mark the "NA" box. Discrepancies or descriptions of inspector interpretation of No vs. NA may be documented in the comments box subsequent to each section. If a provision of the rule applies only to the SPCC Plan, the "Field" column is shaded.

Space is provided in each section to record comments. Additional space is available on the comments page at the end of the checklist. Comments should remain factual and support the evaluation of compliance.

Appendix A is a checklist for qualified facility requirements, which are not found in the main checklist. Note: Qualified facilities must meet the rule requirements in §112.7 and other applicable sections, except for deviations for environmental equivalence, impracticability, security, and bulk containers. The requirements for security and bulk containers for qualified facilities are found in §112.6(c) and (d).

Appendix B is for recording information about containers and other locations at the facility that require secondary containment.

Appendix C is a checklist for documentation of the tests and inspections the facility operator is required to keep with the SPCC Plan.

Appendix D is a checklist for oil removal contingency plans. A contingency plan is required if a facility determines that secondary containment is impracticable as provided in 40 CFR 112.7(d).

FACILITY RESPONSE PLAN (FRP) APPLICABILITY

A non-transportation related onshore facility is required to prepare and implement an FRP as outlined in 40 CFR 112.20 if:

- ☐ The facility transfers oil over water to or from vessels and has a total oil storage capacity greater than or equal to 42,000 gallons, **OR**

The facility has a total oil storage capacity of at least 1 million gallons, and at least one of the following is true:

- ☐ The facility does not have secondary containment sufficiently large to contain the capacity of the largest aboveground tank plus sufficient freeboard for precipitation.
- ☐ The facility is located at a distance such that a discharge could cause injury to fish and wildlife and sensitive environments.
- ☐ The facility is located such that a discharge would shut down a public drinking water intake.
- ☐ The facility has had a reportable discharge greater than or equal to 10,000 gallons in the past 5 years.

Facility has FRP: ☐ Yes ☐ No ☒ Not Required	FRP Number:

Facility has a completed and signed copy of Appendix D, Attachment C-II,

"Certification of the Applicability of the Substantial Harm Criteria." ☒ Yes ☐ No

Comments:

SPCC GENERAL APPLICABILITY—40 CFR 112.1

IS THE FACILITY REGULATED UNDER 40 CFR part 112? The completely buried oil storage capacity is over 42,000 gallons, **OR** the aggregate aboveground oil storage capacity is over 1,320 gallons **AND**	☒ Yes ☐ No
The facility is a non-transportation-related facility engaged in drilling, producing, gathering, storing, processing, refining, transferring, distributing, using, or consuming oil and oil products, which due to its location could reasonably be expected to discharge oil into or upon the navigable waters of the United States (as defined in 40 CFR 110.1).	☒ Yes ☐ No

AFFECTED WATERWAY(S):	DISTANCE:
Mississippi River	~1 1/2 mile

PATH:

on east side
Storm drain to city system → Miss. River

Note: The following storage capacity is not considered in determining applicability of SPCC requirements:

- *Completely buried tanks subject to all the technical requirements of 40 CFR part 280 or a state program approved under 40 CFR part 281.*
- *Equipment subject to the authority of the U.S. Department of Transportation, U.S. Department of the Interior, or Minerals Management Service, as defined in Memoranda of Understanding dated November 24, 1971, and November 8, 1993.*
- *Any facility or part thereof used exclusively for wastewater treatment (production, recovery or recycling of oil is not considered wastewater treatment).*
- *Containers smaller than 55 gallons.*
- *Permanently closed containers.*
- *Motive power containers*

Does the facility have an SPCC Plan? ☒ Yes ☐ No

Comments:

SPCC Qualified Facility APPLICABILITY—40 CFR 112.3(g) *[2006 Rule Provision]*		N/A
112.3(g)(1)	The aggregate aboveground storage capacity is 10,000 gallons or less **AND**	☐ Yes ☒ No
112.3(g)(2)	The facility has had no single discharge as described in §112.1(b) exceeding 1,000 U.S. gallons, **OR** the facility has had no two discharges as described in §112.1(b) exceeding 42 U.S. gallons within any twelve-month period in the three years prior to the SPCC Plan self-certification date, or since becoming subject to the rule if the facility has been in operation for less than three years. (Note: Oil discharges that result from natural disasters, acts of war, or terrorism are not included in this qualification determination.)	☐ Yes ☐ No
IF YES TO BOTH OF THE ABOVE, THEN THE FACILITY IS CONSIDERED A QUALIFIED FACILITY: **Complete relevant sections of this checklist and Appendix A.**		

REQUIREMENTS FOR PREPARATION AND IMPLEMENTATION OF A SPCC PLAN—40 CFR 112.3			
Date facility began operations: Bought in 2007			
Date of initial SPCC Plan preparation: 3/14/05		Current Plan version (date/number): 7/1/07	
112.3(a), (c)	For facilities (excluding farms) in operation prior to August 16, 2002, Plan amended to reflect 2002 SPCC requirements and changes implemented by July 1, 2009	☐ Yes ☒ No ☐ NA	
	For facilities (excluding farms) beginning operation between August 17, 2002, and July 1, 2009, Plan prepared and fully implemented by July 1, 2009	☐ Yes ☐ No ☒ NA	
112.3(b), (c)	For facilities beginning operation after July 1, 2009, Plan prepared and fully implemented before beginning operations	☐ Yes ☐ No ☒ NA	
112.3(d)	*[2002 Rule Requirement] [Except for self-certified Plans]* *Professional Engineer certification includes statement that the PE attests:*		
	• *PE is familiar with the requirements of 40 CFR part 112*	☒ Yes ☐ No ☐ NA	
	• *PE or agent has visited and examined the facility*	☒ Yes ☐ No ☐ NA	
	• *Plan is prepared in accordance with good engineering practice including consideration of applicable industry standards and the requirements of 40 CFR part 112*	☒ Yes ☐ No ☐ NA	
	• *Procedures for required inspections and testing have been established*	☒ Yes ☐ No ☐ NA	
	• *Plan is adequate for the facility*	☒ Yes ☐ No ☐ NA	
	[Requirement for facilities that began operation on or before August 16, 2002] [Except for self-certified Plans] Plans should include evidence that the PE:		
	• Has examined the facility	☒ Yes ☐ No ☐ NA	
	• Is familiar with the provisions of this part	☒ Yes ☐ No ☐ NA	
	• Attests that the SPCC that Plan has been prepared in accordance with good engineering practices	☒ Yes ☐ No ☐ NA	
PE Name: Martin D. Bonnell	License No.: 14610	State: MN	Date of certification: 7/1/07
112.3(e)	*[2002 Rule Requirement]* *Plan available onsite if facility is attended at least 4 hours per day (If facility is unattended, please note nearest field office contact information in comments section below)*	☒ Yes ☐ No ☐ NA	
	[Interim requirement for facilities that began operation on or before August 16, 2002] Plan available onsite if facility is attended at least 8 hours per day (If facility is unattended, please note nearest field office contact information in comments section below)	☒ Yes ☐ No ☐ NA	

Comments:

AMENDMENT OF SPCC PLAN BY REGIONAL ADMINISTRATOR (RA)—40 CFR 112.4		
112.4(a)	Has the facility discharged more than 1,000 gallons of oil in a single reportable discharge or more than 42 gallons in each of two reportable discharges in any 12-month period (see 40 CFR part 110)? Note: A reportable discharge is a discharge as described in §112.1(b).	☐ Yes ☒ No
	• If yes, was information submitted to the RA as required in §112.4(a)?	☐ Yes ☐ No ☐ NA
	• Date(s) of reportable discharges(s):	
	• Were the discharges reported to the NRC?	☐ Yes ☐ No
112.4(d), (e)	Have changes required by the RA been implemented in the Plan and/or facility?	☐ Yes ☐ No ☒ NA
Comments:		

AMENDMENT OF SPCC PLAN BY THE OWNER OR OPERATOR—40 CFR 112.5		
112.5(a)	Has there been a change at the facility that materially affects the potential for a discharge?	☐ Yes ☒ No
	If yes, was the Plan amended within six months of the change?	☐ Yes ☐ No
112.5(b)	Review and evaluation of the Plan completed at least once every 5 years?	☐ Yes ☐ No ☒ NA
	Following Plan review, and if amendment was required, was Plan amended within six months to include more effective prevention and control technology, if available?	☐ Yes ☐ No ☒ NA
	[2002 Rule Requirement]	
	Amendments implemented within six months of any Plan amendment?	☐ Yes ☐ No ☒ NA
	Plan review and evaluation documented in Plan?	☐ Yes ☐ No ☒ NA
112.5(c)	Professional Engineer certification of any technical Plan amendments in accordance with §112.3(d) *[Except for self-certified Plans]*	☐ Yes ☐ No ☒ NA

Name:	License No.:	State:	Date of certification:
Reason for amendment:			
Amendments implemented within six months of any Plan amendment			☐ Yes ☐ No ☒ NA
Comments:			

GENERAL SPCC REQUIREMENTS—40 CFR 112.7		PLAN	FIELD
Management approval at a level of authority to commit the necessary resources to fully implement the Plan		☒ Yes ☐ No	
Name: Bill Boisvert	Title: Division Operation Manage	Date: 4/17/09	
Plan follows sequence of the rule or provides a cross-reference of requirements in the Plan and the rule		☒ Yes ☐ No	
If Plan calls for facilities, procedures, methods, or equipment not yet fully operational, details of their installation and start-up are discussed *(Note: Relevant for inspection evaluation and testing baselines.)*		☐ Yes ☐ No ☒ NA	
112.7(a)(2)	If there are deviations from the requirements of the rule, the Plan states reasons for nonconformance	☐ Yes ☐ No ☒ NA	
	Alternative measures described in detail and provide equivalent environmental protection (Note: Inspector should document if the environmental equivalence is implemented in the field)	☐ Yes ☐ No ☒ NA	☐ Yes ☐ No ☒ NA
Describe each deviation and reasons for nonconformance			

	[2002 Rule Requirement]		
112.7(a)(3)	*Plan includes diagram with location and contents of all regulated containers (including completely buried tanks otherwise exempt from the SPCC requirements), transfer stations, and connecting pipes (Note in comments any discrepancies between the diagram and what is observed in the field)*	☐ Yes ☐ No	☐ Yes ☐ No
112.7(a)(3)	*Plan addresses each of the following:*		
	(i) For each container, type of oil and storage capacity (see Appendix B)	☐ Yes ☐ No	☐ Yes ☐ No
	(ii) Discharge prevention measures, including procedures for routine handling of products	☐ Yes ☐ No	☐ Yes ☐ No
	(iii) Discharge or drainage controls, such as secondary containment around containers, and other structures, equipment, and procedures for the control of a discharge	☐ Yes ☐ No	☐ Yes ☐ No
	(iv) Countermeasures for discharge discovery, response, and cleanup (both facility's and contractor's resources)	☐ Yes ☐ No	☐ Yes ☐ No
	(v) Methods of disposal of recovered materials in accordance with applicable legal requirements	☐ Yes ☐ No	
	(vi) Contact list and phone numbers for the facility response coordinator, National Response Center, cleanup contractors contracted to respond to a discharge, and all Federal, State, and local agencies who must be contacted in the case of a discharge as described in §112.1(b)	☐ Yes ☐ No ☐ NA	
	[2002 Rule Requirement]		
112.7(a)(4)	*Plan includes information and procedures that enable a person reporting a discharge as described in §112.1(b) to relate information on the exact address or location and phone number of the facility; the date and time of the discharge; the type of material discharged; estimates of the total quantity discharged; estimates of the quantity discharged as described in §112.1(b); the source of the discharge; a description of all affected media; the cause of the discharge; any damages or injuries caused by the discharge; actions being used to stop, remove, and mitigate the effects of the discharge; whether an evacuation may be needed; and the names of individuals and/or organizations who have also been contacted (Not required if a facility has an FRP)*	☐ Yes ☐ No ☐ NA	

GENERAL SPCC REQUIREMENTS—40 CFR 112.7		PLAN	FIELD
112.7(a)(5)	*[2002 Rule Requirement]* *Plan organized so that portions describing procedures to be used when a discharge occurs will be readily usable in an emergency (Not required if a facility has an FRP)*	☐ Yes ☐ No ☐ NA	
112.7(b)	Plan includes a prediction of the direction, rate of flow, and total quantity of oil that could be discharged for each type of major equipment failure where experience indicates a reasonable potential for equipment failure	☒ Yes ☐ No ☐ NA	☒ Yes ☐ No ☐ NA
112.7(c)	Appropriate containment and/or diversionary structures or equipment provided to prevent a discharge as described in §112.1(b), except as provided in 112.7(k) of this section for qualified operational equipment, before cleanup occurs. *The entire containment system, including walls and floors, are capable of containing oil and are constructed to prevent escape of a discharge from the containment system before cleanup occurs* (1) **For onshore facilities**, one of the following or its equivalent: (i) dikes, berms, or retaining walls sufficiently impervious to contain oil, (ii) curbing, (iii) culverting, gutters or other drainage systems, (iv) weirs, booms or other barriers, (v) spill diversion ponds, (vi) retention ponds, or (vii) sorbent materials (See Appendix B)	☒ Yes ☐ No ☐ NA	☒ Yes ☐ No ☐ NA
112.7(d)	Determination(s) of impracticability of secondary containment	☐ Yes ☒ No	
If YES:	Is the impracticability of secondary containment clearly demonstrated?	☐ Yes ☐ No ☒ NA	☐ Yes ☐ No ☒ NA
	[2002 Rule Requirement] *For bulk storage containers, periodic integrity testing of containers and leak testing of the valves and piping associated with the container is conducted*	☐ Yes ☐ No ☒ NA	☐ Yes ☐ No ☒ NA
	Unless facility has FRP: (1) Contingency Plan following 40 CFR part 109 (see Appendix D checklist) is provided **AND**	☐ Yes ☐ No ☒ NA	
	(2) Written commitment of manpower, equipment, and materials required to control and remove any quantity of oil discharged that may be harmful	☐ Yes ☐ No ☒ NA	☐ Yes ☐ No ☒ NA

Comments concerning impracticability determination(s) for secondary containment:

Other comments:

* Rail car loading (i.e. to the facility) outside the east wall of the facility via flexible hoses. 3 cars can be unload at the same time. Spill pads below the car outlets (at the bottom) can catch the slow spill and leads it to the 6,000-gal. UST in the building. If the flexible hose happen to be ~~direct timed~~ disconnected for any reason, the speed of the spill might splash out of the pad and flow to the drain on the east side. This calls into question whether the general containment requirement is met or not.

GENERAL SPCC REQUIREMENTS—40 CFR 112.7		PLAN	FIELD
112.7(e)	Inspections and tests conducted in accordance with written procedures	☒ Yes ☐ No	☒ Yes ☐ No
	Record of inspections or tests signed by supervisor or inspector and kept with Plan for at least 3 years (see Appendix C checklist)	☒ Yes ☐ No	☒ Yes ☐ No
112.7(f)	**Personnel, training, and oil discharge prevention procedures [1973 Rule: 112.7(e)(10)]**		
(1)	Training of oil-handling personnel in operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules and regulations; *general facility operations; and contents of SPCC Plan*	☒ Yes ☐ No ☐ NA	☒ Yes ☐ No ☐ NA
(2)	Person designated as accountable for discharge prevention at the facility	☒ Yes ☐ No ☐ NA	☒ Yes ☐ No ☐ NA
	[2002 Rule Requirement]	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
(3)	*Discharge prevention briefings conducted at least once a year for oil handling personnel*		
	[Interim requirement for facilities that began operation on or before August 16, 2002]		
(3)	Spill prevention briefings scheduled and conducted at intervals frequent enough to assure adequate understanding of the SPCC Plan for that facility.	☒ Yes ☐ No ☐ NA	☒ Yes ☐ No ☐ NA
112.7(g)	**Security (excluding production facilities) [1973 Rule: 112.7(e)(9)]** [Except self-certified Plans]		
(1)	Facility fully fenced and gates are locked and/or guarded when facility is unattended	☒ Yes ☐ No ☐ NA	☒ Yes ☐ No ☐ NA
(2)	Master flow and drain valves and any other valves permitting direct outward flow of the container's contents to the surface have adequate security measures so that they remain in the closed position when in non-operating or non-standby status	☒ Yes ☐ No ☐ NA	☒ Yes ☐ No ☐ NA
(3)	Pump starter controls locked in "off" position and accessible only to authorized personnel when in non-operating/non-standby status	☒ Yes ☐ No ☐ NA	☒ Yes ☐ No ☐ NA
(4)	Loading/unloading connections of oil pipelines or facility piping securely capped or blank-flanged when not in service or when in standby service for an extended period of time, including piping that is emptied of liquid content either by draining or by inert gas pressure	☒ Yes ☐ No ☐ NA	☒ Yes ☐ No ☐ NA
(5)	Adequate facility lighting commensurate with the type and location of the facility that assists in the discovery of discharges occurring during hours of darkness and to prevent discharges occurring through acts of vandalism	☒ Yes ☐ No ☐ NA	☒ Yes ☐ No ☐ NA
Comments:			
112.7(h)	**Tank car and tank truck loading/unloading rack [1973 Rule: 112.7(4)]** Note that a tank car/truck loading/unloading rack must be present for §112.7(h) to apply		
(1)	Does loading/unloading area (the location adjacent to the **loading or unloading rack**) drainage flow to catchment basin or treatment facility? ☐ Yes ☒ No • If **NO**, quick drainage system used	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	Containment system holds capacity of the largest single compartment of a tank car/truck loaded/unloaded at the facility	☒ Yes ☐ No ☐ NA	☒ Yes ☐ No ☐ NA
(2)	Physical barriers, warning signs, wheel chocks, or vehicle brake interlock system in loading/unloading areas (the location adjacent to the **loading or unloading rack**) to prevent vehicles from departing before complete disconnection of flexible or fixed oil transfer lines	☒ Yes ☐ No ☐ NA	☒ Yes ☐ No ☐ NA
(3)	Lower-most drains and all outlets on tank cars/trucks inspected prior to filling/departure, and, if necessary ensure that they are tightened, adjusted, or replaced to prevent liquid discharge while in transit	☒ Yes ☐ No ☐ NA	☒ Yes ☐ No ☐ NA

GENERAL SPCC REQUIREMENTS—40 CFR 112.7		PLAN	FIELD
Comments:			
112.7(i)	**Brittle fracture evaluation of field-constructed aboveground containers** *[2002 Rule Requirement]*		
	Brittle fracture evaluation is conducted after tank repair/alteration/change in service that might affect the risk of a discharge or after a discharge/failure due to brittle fracture or other catastrophe, and appropriate action taken as necessary (for field-constructed aboveground containers)	☐ Yes ☐ No ☒ NA	☐ Yes ☐ No ☒ NA
112.7(j)	**State rules, regulations and guidelines and conformance with applicable sections of 40 CFR part 112 [1973 Rule: 112.7(e)]**		
	Discussion of conformance with applicable more stringent State rules, regulations, and guidelines and other effective discharge prevention and containment procedures listed in 40 CFR part 112	☐ Yes ☐ No ☒ NA	
112.7(k)	**Qualified oil-filled operational equipment secondary containment option** *[2006 Rule Amendment]* N/A		
(1)	Has a single reportable discharge as described in §112.1(b) from any oil-filled operational equipment exceeding 1,000 U.S. gallons occurred within any 12-month period within the three years prior to Plan certification date?	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	Have two reportable discharges as described in §112.1(b) from any oil-filled operational equipment each exceeding 42 U.S. gallons occurred within any 12-month period within the three years prior to Plan certification date?	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	• If YES for either, secondary containment is required. (Note: Oil discharges that result from natural disasters, acts of war, or terrorism are not included in this qualification determination.) See 112.7(c).		
If NO and no secondary containment is provided	(2)(i) Facility procedure for inspections/monitoring program is established and documented	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	(2)(ii) Unless facility has FRP: Contingency plan following 40 CFR part 109 (see Appendix D checklist) is provided **AND**	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	Written commitment of manpower, equipment, and materials required to control and remove any quantity of oil discharged that may be harmful	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
Comments:			

ONSHORE FACILITIES (EXCLUDING PRODUCTION)—112.8/112.12		PLAN	FIELD
112.8(b)/112.12(b) Facility Drainage [1973 Rule: 112.7(e)(1)] For the 2,000 gal. diesel tank only			
(1)	Drainage from diked storage areas is restrained by valves, **OR** manually activated pumps or ejectors are used and the condition of the accumulation is inspected prior to discharge to ensure no oil will be discharged.	☒ Yes ☐ No ☐ NA	☒ Yes ☐ No ☐ NA
(2)	Valves from diked storage areas are manual, open-and-closed design (not flapper-type drain valves)	☒ Yes ☐ No ☐ NA	☒ Yes ☐ No ☐ NA
	If drainage is released directly to a watercourse and not into an onsite wastewater treatment plant, storm water inspected per §112.8(c)(3)(ii), (iii), and (iv) or §112.12(c)(3)(ii), (iii), and (iv)	☒ Yes ☐ No ☐ NA	☒ Yes ☐ No ☐ NA
(3)	Drainage from undiked areas with a potential for discharge designed to flow into ponds, lagoons, or catchment basins to retain oil or return it to facility. Catchment basin located away from flood areas.*	☐ Yes ☐ No ☒ NA	☐ Yes ☐ No ☒ NA
(4)	If facility drainage not engineered as in (b)(3), the facility is equipped with a diversion system to retain oil in the facility in the event of a discharge.*	☐ Yes ☐ No ☒ NA	☐ Yes ☐ No ☐ NA

ONSHORE FACILITIES (EXCLUDING PRODUCTION)—112.8/112.12	PLAN	FIELD
(5) Are facility drainage waters continuously treated in more than one treatment unit and pump transfer is needed? ☐ Yes ☒ No If **YES:**		
• Two "lift" pumps available and at least one permanently installed	☐ Yes ☐ No	☐ Yes ☐ No
• Facility drainage systems engineered to prevent a discharge as described in §112.1(b) in the case of equipment failure or human error	☐ Yes ☐ No	☐ Yes ☐ No
Comments: * These provisions apply only when a facility drainage system is used for containment; otherwise mark NA. .		
112.8(c)/112.12(c) Bulk Storage Containers [1973 Rule: 112.7(e)(2)] If bulk storage containers are not present, mark this section Non Applicable (NA). If present, complete this section and Appendix B of this checklist)		
(1) Containers compatible with material stored and conditions of storage such as pressure and temperature	☒ Yes ☐ No ☐ NA	☒ Yes ☐ No ☐ NA
(2) Except for mobile refuelers, construct secondary containment to hold capacity of largest container and sufficient freeboard for precipitation	☒ Yes ☐ No ☐ NA	☒ Yes ☐ No ☐ NA
Diked areas sufficiently impervious to contain discharged oil	☒ Yes ☐ No ☐ NA	☒ Yes ☐ No ☐ NA
Alternatively, any discharge to a drainage trench system will be safely confined in a facility catchment basin or holding pond	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
(3) Is there drainage of uncontaminated rainwater from diked areas into a storm drain or open watercourse? ☐ Yes ☐ No If **YES:** AGI ASTs are located inside		
(i) Bypass valve normally sealed closed except 1 2000 gal diesel	☒ Yes ☐ No ☒ NA	☒ Yes ☐ No ☒ NA
(ii) Retained rainwater is inspected to ensure that its presence will not cause a discharge as described in §112.1(b)	☒ Yes ☐ No ☐ NA	☒ Yes ☐ No ☐ NA
(iii) Bypass valve opened and resealed under responsible supervision	☒ Yes ☐ No ☐ NA	☒ Yes ☐ No ☐ NA
(iv) Adequate records of drainage are kept; for example, records required under permits issued in accordance with 40 CFR 122.41(j)(2) and (m)(3)	☐ Yes ☐ No ☒ NA	☐ Yes ☐ No ☒ NA
(4) For completely buried metallic tanks installed on or after January 10, 1974 (if not exempt from SPCC regulation because subject to all of the technical requirements of 40 CFR part 280 or 281):		
• Corrosion protection with coatings or cathodic protection compatible with local soil conditions	☐ Yes ☐ No ☒ NA	☐ Yes ☐ No ☒ NA
• Regular leak testing conducted	☐ Yes ☐ No ☒ NA	☐ Yes ☐ No ☒ NA
(5) Partially buried or bunkered metallic tanks protected from corrosion with coatings or cathodic protection compatible with local soil conditions	☐ Yes ☐ No ☒ NA	☐ Yes ☐ No ☒ NA

ONSHORE FACILITIES (EXCLUDING PRODUCTION)—112.8/112.12		PLAN	FIELD
Comments:			
(6) [Except for self-certified Plans]	*[2002 Rule Requirement]* *Aboveground containers integrity tested by visual inspection and another technique such as hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or another system of non-destructive shell testing on a regular schedule and whenever material repairs are made*	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	[Interim requirement for facilities that began operation on or before August 16, 2002] Aboveground tanks integrity tested using such techniques as hydrostatic testing, visual inspection or a system of non-destructive shell thickness testing.	☒ Yes ☐ No ☐ NA	☒ Yes ☐ No ☐ NA
	Container supports and foundations regularly inspected	☒ Yes ☐ No ☐ NA	☒ Yes ☐ No ☐ NA
	Outside of containers frequently inspected for signs of deterioration, discharges, or accumulation of oil inside diked areas	☒ Yes ☐ No ☐ NA	☒ Yes ☐ No ☐ NA
	Records of inspections and tests maintained	☒ Yes ☐ No ☐ NA	☒ Yes ☐ No ☐ NA
(7)	Leakage through defective internal heating coils controlled: • Steam returns and exhaust lines from internal heating coils that discharge into an open water source are monitored for contamination, **OR** • Steam returns and exhaust lines pass through a settling tank, skimmer, or other separation or retention system	☐ Yes ☐ No ☒ NA	☐ Yes ☐ No ☒ NA
(8)	Each container is equipped with at least one of the following for liquid level sensing: (i) high liquid level alarms with an audible or visual signal at a constantly attended operation or surveillance station, or audible air vent in smaller facilities, (ii) high liquid level pump cutoff devices set to stop flow at a predetermined container content level, (iii) direct audible or code signal communication between container gauger and pumping station, (iv) fast response system (such as digital computers, telepulse, or direct vision gauges) *and a person is present to monitor gauges and the overall filling of bulk storage containers.* (v) liquid level sensing devices regularly tested to ensure proper operation	☒ Yes ☐ No ☐ NA	☒ Yes ☐ No ☐ NA
(9)	Effluent treatment facilities observed frequently enough to detect possible system upsets that could cause a discharge as described in §112.1(b)	☐ Yes ☐ No ☒ NA	☐ Yes ☐ No ☒ NA
(10)	Visible discharges which result in a loss of oil from the container, including but not limited to seams, gaskets, piping, pumps, valves, rivets, and bolts are promptly corrected and oil in diked areas is promptly removed	☒ Yes ☐ No ☐ NA	☒ Yes ☐ No ☐ NA
(11)	Mobile or portable containers positioned to prevent a discharge to prevent a discharge as described in §112.1(b).	☒ Yes ☐ No ☐ NA	☒ Yes ☐ No ☐ NA
	Mobile or portable containers (excluding mobile refuelers) have secondary containment with sufficient capacity to contain the largest single compartment or container *and sufficient freeboard to contain precipitation*	☒ Yes ☐ No ☐ NA	☒ Yes ☐ No ☐ NA

ONSHORE FACILITIES (EXCLUDING PRODUCTION)—112.8/112.12		PLAN	FIELD
Comments:			
112.8(d)/112.12(d) Facility transfer operations, pumping, and facility process [1973 Rule: 112.7(e)(3)]			
(1)	*[2002 Rule Requirement]* *Buried piping installed or replaced on or after August 16, 2002 has protective wrapping or coating*	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	Buried piping installed or replaced on or after August 16, 2002 is cathodically protected or otherwise satisfies corrosion protection standards for piping in 40 CFR part 280 or 281	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
	[Interim requirement for facilities that began operation on or before August 16, 2002] Buried piping has protective wrapping or coating and is cathodically protected if soil conditions warrant.	☐ Yes ☐ No ☒ NA	☐ Yes ☐ No ☒ NA
	Exposed buried piping is inspected for deterioration and corrosion damage is examined and corrected	☐ Yes ☐ No ☒ NA	☐ Yes ☐ No ☒ NA
(2)	Piping terminal connection at the transfer point is marked as to origin and capped or blank-flanged when not in service or in standby service for an extended time	☒ Yes ☐ No ☐ NA	☒ Yes ☐ No ☐ NA
(3)	Pipe supports are properly designed to minimize abrasion and corrosion and allow for expansion and contraction	☒ Yes ☐ No ☐ NA	☒ Yes ☐ No ☐ NA
(4)	Aboveground valves, piping, and appurtenances such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces are inspected regularly	☒ Yes ☐ No ☐ NA	☒ Yes ☐ No ☐ NA
	[2002 Rule Requirement] *Integrity and leak testing conducted on buried piping at time of installation, modification, construction, relocation, or replacement*	☐ Yes ☐ No ☐ NA	☐ Yes ☐ No ☐ NA
(5)	Vehicles warned so that no vehicle endangers aboveground piping *and other oil transfer operations*	☒ Yes ☐ No ☐ NA	☒ Yes ☐ No ☐ NA

ONSHORE FACILITIES (EXCLUDING PRODUCTION)—~~112.8/112.12~~	PLAN	FIELD

Comments: General comments:

Arrival : 2:00 PM
Departed : 3:30 PM

Scott Bergman, Facility & ~~Program~~ Project Manager > Lube-Tech
Tom Neumann, Warehouse Manager
Tim Peterson, Asst. V.P. of Operations MN
OECS, Inc.
Chris Basher, MPCA

① Bought the facility from Hallman Oil in 2007.

② ~~10~~ 10,000 gal. > indoors, concrete wall and floor
~~15~~ 9,550 gal.
1 2,000 gal. diesel — outdoors, concrete containment box

③ Unloading rack area is indoors, ~~sloping~~ to a trench which flows into a 6,000 gal. UST.

④ Rail car transfer area is located outdoors on the east side. 3 cars can be unloaded at same time. Spill trays underneath the rail car outlets can catch the spill and lead the flow to the UST (6,000-gal.). General containment requirement may not be met. (flow rate, response time, detection time?)

⑤ The facility also has thousands of 55-gal. drums and hundreds of ~300-gal. toters in storage.

⑥ Traing record, inspection records are available. Drainage record is N/A.

ADDITIONAL COMMENTS	
Rule Provision	**Comment**

PHOTO DOCUMENTATION LOG	
Photo Number	**Description (include date, location, and direction)**

Qualified Facilities Checklist

Appendix A: Qualified Facility Plan Requirements

Complete this Appendix only if the facility is a "qualified facility" as defined in §112.3(g). A qualified facility's Plan, whether certified by a PE or self-certified, must comply with all of the applicable requirements of §112.7 and subparts B and C of 40 CFR Part 112 referenced earlier in this checklist.

112.6–Qualified Facility Plan Requirements	**Yes**	**No**	**NA**
(a) Did the owner/operator of the qualified facility self-certify the SPCC Plan? *If **NO,** see requirements for 112.3(d) above. If **YES,** did the owner/operator certify in the Plan that:*			
(1) He or she is familiar with the requirements of 40 CFR part 112.			
(2) He or she has visited and examined the facility.			
(3) The Plan has been prepared in accordance with accepted and sound industry practices and standards.			
(4) Procedures for required inspections and testing have been established.			
(5) The Plan is being fully implemented.			
(6) The facility meets the qualification criteria set forth under §112.3 (g).			
(7) The Plan does not deviate from any requirements as allowed by §112.7(a)(2) and 112.7(d), except as described under §112.6(c).			
(8) Management has given full approval of the Plan and necessary resources have been committed for the Plan's full implementation.			
(b) Did the owner/operator self-certify any of the Plan's technical amendments?			
If **YES:** Is the certification of any technical amendments in accordance with the provisions above (§112.6(a))?			
(c)(1) and (d)(1) Environmental Equivalence. For each alternative measure allowed under §112.7(a)(2), the Plan is accompanied by a written statement by a PE that states the reason for nonconformance and describes the alternative method and how it provides equivalent environmental protection in accordance with §112.7(a)(2).			
(c)(2) and (d)(1) Impracticability. For each determination of impracticability of secondary containment pursuant to §112.7(d), the Plan clearly explains why secondary containment measures are not practicable at this facility and provides the alternative measures required in §112.7(d) in lieu of secondary containment.			
(c)(3) Security. The Plan contains one of the following: (i) The Plan complies with requirements under §112.7(g), **OR** (ii) The Plan complies with the requirements under §112.6(c)(3)(ii): Plan describes how the owner/operator secures and and controls access to the oil handling, processing and storage areas; secures master flow and drain valves; prevents unauthorized access to starter controls on oil pumps; secures out-of-service and loading/unloading connections of oil pipelines; addresses the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges.			
(c)(4) Bulk Storage Containers. The Plan contains one of the following: (i) The Plan complies with the requirements under §§112.8(c)(6) or 112.12(c)(6), as applicable; **OR** (ii) The Plan complies with the requirements under §112.6(c)(4)(ii): • Aboveground containers, supports and foundations tested for integrity on a regular schedule and whenever repairs are made. • Appropriate qualifications for personnel performing tests and inspections have been determined in accordance with industry standards. • The frequency and type of testing and inspections have been determined in accordance with industry standards, taking into account container size, configuration and design. • Container supports and foundations regularly inspected • Outside of containers frequently inspected for signs of deterioration, discharges, or accumulation of oil inside diked areas • Records of inspections and tests maintained			
(d) Did a PE certify a portion of a qualified facility's self-certified Plan? *If **YES,** the PE must certify in the Plan that:*			

(d)(2) (i) He/she is familiar with the requirements of 40 CFR Part 112. (ii) He/she or a representative agent has visited and examined the facility. (iii) The alternative method of environmental equivalence in accordance with §112.7(a)(2) or the determination of impracticability and alternative measures in accordance with §112.7(d) is consistent with good engineering practice, including consideration of applicable industry standards, and with the requirements of 40 CFR Part 112.			
(b)(1) If a PE certified a portion of the Plan, did a PE certify any technical amendments that affect this portion of the Plan?			
Comments:			

SPCC FIELD INSPECTION AND PLAN REVIEW TABLE

Appendix B: Documentation of Field Observations for Containers and Associated Requirements

Inspectors should use this table to document observations of containers as needed.

Containers and Piping

Check containers for leaks, specifically looking for: drip marks, discoloration of tanks, puddles containing spilled or leaked material, corrosion, cracks, and localized dead vegetation, and standards/specifications of construction.

Check foundation for: cracks, discoloration, puddles containing spilled or leaked material, settling, gaps between container and foundation, and damage caused by vegetation roots.

Check piping for: droplets of stored material, discoloration, corrosion, bowing of pipe between supports, evidence of stored material seepage from valves or seals, and localized dead vegetation. (Document in comments section of §112.8(d) / §112.12(d).)

Secondary Containment (Active and Passive)

Check secondary containment for: containment system (including walls and floor) ability to contain oil such that oil will not escape the containment system before cleanup occurs, proper sizing, cracks, discoloration, presence of spilled or leaked material (standing liquid), erosion, corrosion, and valve conditions.

Check dike or berm systems for: level of precipitation in dike/available capacity, operational status of drainage valves (closed), dike or berm impermeability, debris, erosion, impermeability of the earthen floor/walls of diked area, and location/status of pipes, inlets, drainage around and beneath containers, presence of oil discharges within diked areas.

Check retention and drainage ponds for: erosion, available capacity, and presence of spilled or leaked material, debris, and stressed vegetation.

Check active measures (countermeasures) for: amount indicated in plan is available and appropriate; deployment procedures are realistic; material is located so that they are readily available; efficacy of discharge detection; availability of personnel and training, appropriateness of measures to prevent a discharge as described in §112.1(b).

Container ID/ General Condition	Storage Capacity and Type of Oil	Type of Containment/ Drainage Control	Overfill Protection and Testing & Inspections

SPCC INSPECTION AND TESTING CHECKLIST

Appendix C: Required Documentation of Tests and Inspections

Records of inspections and tests required by 40 CFR part 112 signed by the appropriate supervisor or inspector must be kept with the SPCC Plan for a period of three years. Records of inspections and tests conducted under usual and customary business practices will suffice. Documentation of the following inspections and tests should be kept with the SPCC Plan.

Inspection or Test		Documentation		Not Applicable
		Present	Not Present	
112.7–General SPCC Requirements				
[2002 Rule Requirement]				
(d)	*Integrity testing is conducted for bulk storage containers with no secondary containment system and for which an impracticability determination has been made*			
(d)	*Integrity and leak testing of valves and piping associated with bulk storage containers with no secondary containment system and for which an impracticability determination has been made*			
(i)	*Evaluate field-constructed aboveground containers for potential for brittle fracture or other catastrophic failure when the container undergoes a repair, alteration, reconstruction or change in service*			
112.8/112.12–Onshore facilities (excluding production)				
(b)(2)	Storm water released from facility drainage directly to a watercourse is inspected and records of drainage are kept			
(c)(3)(iv)	Rainwater released directly from diked containment areas to a storm drain or open watercourse is inspected and records of drainage are kept			
(c)(4)	Regular leak testing of completely buried metallic storage tanks			
(c)(6)	Aboveground containers tested for integrity on a regular schedule			
(c)(6) schedule.	Aboveground containers, supports and foundations visually inspected on a regular			
(c)(6)	Diked areas inspected for accumulations of oil.			
(c)(8)(v)	Liquid level sensing devices regularly tested to ensure proper operation			
(c)(9)	Effluent treatment facilities are observed frequently enough to detect possible system upsets that could cause a discharge as described in §112.1(b)			
(d)(1)	When buried piping is exposed, it is carefully inspected for deterioration and corrosion			
(d)(4)	Aboveground valves, piping and appurtenances are regularly inspected and the general condition of flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces are assessed			
[2002 Rule Requirement]				
(d)(4)	*Integrity and leak testing of buried piping is conducted at time of installation, modification, construction, relocation or replacement*			
112.6—Qualified Facilities *(Complete this section only if the facility is a "qualified facility" as defined in §112.3(g))*				
(c)(4)(i)	Comply with the requirements under §112.8(c)(6) or §112.12(c)(6) as applicable (see above);			
OR				
(c)(4)(ii)	Aboveground containers inspected and/or tested for integrity on a regular schedule and whenever repairs are made			
	Appropriate qualifications for personnel performing tests and inspections have been determined in accordance with industry standards			
	The frequency and type of testing and inspections have been determined in accordance with industry standards, taking into account container size, configuration and design			

SPCC CONTINGENCY PLAN REVIEW CHECKLIST

Appendix D: 40 CFR Part 109–Criteria for State, Local and Regional Oil Removal Contingency Plans

If a facility makes an impracticability determination for secondary containment in accordance with §112.7(d), it is required to provide an oil spill contingency plan following 40 CFR part 109. An oil spill contingency plan may also be developed as an alternative to general secondary containment for qualified oil filled operational equipment in accordance with §112.7(k).

109.5–Development and implementation criteria for State, local and regional oil removal contingency plans*	**Yes**	**No**
(a) Definition of the authorities, responsibilities and duties of all persons, organizations or agencies which are to be involved in planning or directing oil removal operations.		
(b) Establishment of notification procedures for the purpose of early detection and timely notification of an oil discharge including:		
(1) The identification of critical water use areas to facilitate the reporting of and response to oil discharges.		
(2) A current list of names, telephone numbers and addresses of the responsible persons (with alternates) and organizations to be notified when an oil discharge is discovered.		
(3) Provisions for access to a reliable communications system for timely notification of an oil discharge, and the capability of interconnection with the communications systems established under related oil removal contingency plans, particularly State and National plans (e.g., NCP).		
(4) An established, prearranged procedure for requesting assistance during a major disaster or when the situation exceeds the response capability of the State, local or regional authority.		
(c) Provisions to assure that full resource capability is known and can be committed during an oil discharge situation including:		
(1) The identification and inventory of applicable equipment, materials and supplies which are available locally and regionally.		
(2) An estimate of the equipment, materials and supplies that would be required to remove the maximum oil discharge to be anticipated.		
(3) Development of agreements and arrangements in advance of an oil discharge for the acquisition of equipment, materials and supplies to be used in responding to such a discharge.		
(d) Provisions for well defined and specific actions to be taken after discovery and notification of an oil discharge including:		
(1) Specification of an oil discharge response operating team consisting of trained, prepared and available operating personnel.		
(2) Predesignation of a properly qualified oil discharge response coordinator who is charged with the responsibility and delegated commensurate authority for directing and coordinating response operations and who knows how to request assistance from Federal authorities operating under existing national and regional contingency plans.		
(3) A preplanned location for an oil discharge response operations center and a reliable communications system for directing the coordinated overall response operations.		
(4) Provisions for varying degrees of response effort depending on the severity of the oil discharge.		
(5) Specification of the order of priority in which the various water uses are to be protected where more than one water use may be adversely affected as a result of an oil discharge and where response operations may not be adequate to protect all uses.		
(e) Specific and well defined procedures to facilitate recovery of damages and enforcement measures as provided for by State and local statutes and ordinances.		

* The contingency plan should be consistent with all applicable state and local plans, Area Contingency Plans, and the National Contingency Plan (NCP).